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September 30, 2021

By CM/ECF Posting

The Honorable Mary Kay Vyskocil
United States District Court
for the Southern District of New York
500 Pearl Street, Room 2230
New York, New York 10007

Re: *Shabtai Scott Shatsky, et al. v. The Palestine Liberation
Organization, et al.*, Case No. 18 Civ. 12355 (MKV)

Dear Judge Vyskocil:

We represent Plaintiffs in this action. By a memorandum endorsement dated September 10, 2021, Your Honor directed that Plaintiffs file their papers in opposition to Defendants' motion to dismiss for lack of personal jurisdiction (the "Motion") on or before October 4, 2021. (Dkt. No. 126). Plaintiffs anticipate that their opposition papers will include a substantial volume of evidentiary material demonstrating that Defendants have engaged in conduct that, under the Promoting Security and Justice for Victims of Terrorism Act, results in a consent to personal jurisdiction. Moreover, because much of the evidentiary material that Plaintiffs expect to file with the Court was produced by Defendants in jurisdictional discovery with a "Confidential" designation, paragraph 17 of the Protective Order in this case (Dkt. Nos. 64, 95) requires Plaintiffs to deliver to the Court and to Defendants by e-mail multiple unredacted copies of Plaintiffs' opposition papers, in addition to the courtesy copy that Your Honor's individual rules of practice require. Defendants have agreed that Plaintiffs may serve their papers opposing the Motion through our firm's secure electronic file transfer system. However, given the anticipated number and size of the exhibits to Plaintiffs' opposition papers, we are concerned that it will be very difficult to upload those papers to the CM/ECF system over the Internet and deliver the necessary copy sets of them to Your Honor by e-mail.

Under the circumstances, Plaintiffs respectfully request that Your Honor authorize them to file their opposition papers with the Court by hand delivering to the Clerk's Office a memory stick, CD-ROM or other external media containing copies of the



The Honorable Mary Kay Vyskocil
September 30, 2021
Page 2

papers in .pdf-a format in lieu of uploading them directly to the CM/ECF system. Plaintiffs also respectfully request authorization to provide Your Honor with the copies of their papers that paragraph 17 of the Protective Order requires, as well as the necessary courtesy copy, on external media by overnight mail. In the alternative, Plaintiffs respectfully request guidance as to the method by which they should file their papers with the Court and deliver additional copies of the papers to Your Honor in accordance with the Protective Order and Your Honor's individual rules of practice.

We have conferred with counsel for Defendants concerning the request in this letter, and understand that Defendants have no objection to it.

Thank you for your consideration.

Respectfully submitted,

A handwritten signature in blue ink, appearing to read 'Stephen M. Sinaiko', with a long horizontal flourish extending to the right.

Stephen M. Sinaiko

cc: All Counsel (by CM/ECF Posting)